

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE QUDIAN INC. SECURITIES
LITIGATION

Master File No.: 1:17-CV-09741-JMF

**PLAINTIFFS' NOTICE OF UNOPPOSED MOTION FOR
(I) PRELIMINARY APPROVAL OF CLASS ACTION SETTLEMENT;
(II) CERTIFICATION OF THE CLASS; AND
(III) APPROVAL OF NOTICE TO THE CLASS**

TO THE CLERK OF THE COURT AND ALL PARTIES AND THEIR ATTORNEYS
OF RECORD HEREIN:

PLEASE TAKE NOTICE that Lead Plaintiffs Alan B. Hertz and the Alan Hertz Family 2012 Trust, and additional named plaintiff Darwin Sutanto (collectively, “Plaintiffs”), will and hereby move this Court on a date and at such time as may be designated by the Honorable Jesse M. Furman, Courtroom 1105, United States District Court for the Southern District of New York, Thurgood Marshall United States Courthouse, 40 Foley Square, New York, New York, 10007 for an order: (i) granting Preliminary Approval of the Proposed Settlement; (ii) certifying the putative Class for purposes of settlement only; (iii) granting approval of the form and manner of giving notice of the proposed Settlement to the Class Members; and (iv) setting a date for a final Settlement Hearing and deadlines for providing notice of the Settlement, the filing of Class Member objections, the filing of Class Member opt-out notices, the filing of Plaintiffs’ motion for final approval of the Settlement, and the filing of Lead Counsel’s application for attorneys’ fees and expenses.

This motion is based upon the concurrently filed Memorandum of Law and Declaration of Jonathan M. Rotter (“Rotter Declaration”), and other such matters and argument as the Court may consider at the hearing on this motion. The Stipulation and Agreement of Settlement (the “Stipulation”) is attached as Exhibit 1 to the Rotter Declaration. The Defendants, as defined in the Stipulation, do not oppose this motion.

Dated: November 13, 2020

By: /s/ Jonathan M. Rotter
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*Co-Lead Counsel for Plaintiffs and the
Proposed Settlement Class*

PROOF OF SERVICE

I, the undersigned say:

I am not a party to the above case and am over eighteen years old.

On November 13, 2020, I served true and correct copies of the foregoing document, by posting the document electronically to the ECF website of the United States District Court for the Southern District of New York, for receipt electronically by the parties listed on the Court's Service List.

I affirm under penalty of perjury under the laws of the United States of America that the foregoing is true and correct. Executed on November 13, 2020.

s/ Jonathan M. Rotter
Jonathan M. Rotter